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DISTRICT OF NEVADA	
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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

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10 UNITED STATES OF AMERICA,) CRIMINAL INDICTMENT
11 PLAINTIFF,) 2:08-cr- 027
12 VS.)
13 GREGORY HOFFMAN,) **VIOLATIONS:**
14 DEFENDANT.) 18 U.S.C. §2252A(a)(1) - Transporting
Child Pornography;
15) 18 U.S.C. §2252A(a)(2) - Receipt of Child
16 Child Pornography;
17) 18 U.S.C. §2252A(a)(5)(B) - Possession of
Child Pornography;
18) 18 U.S.C. §2253 - Criminal Forfeiture

19 THE GRAND JURY CHARGES THAT:

20 **COUNT ONE**

21 Transporting Child Pornography

22

23 On or about July 2, 2007, in the State and Federal District of Nevada and
elsewhere,

24 **GREGORY HOFFMAN,**

25 defendant herein, did knowingly mail, transport and ship in interstate and foreign commerce
26 by any means, including by computer, child pornography as defined in Title 18, United States
Code, Section 2256(8), in violation of Title 18, United States Code, Section 2252A(a)(1).

COUNT TWO
Receipt of Child Pornography

GREGORY HOFFMAN,

6 defendant herein, did knowingly receive child pornography, as defined in Title 18, United
7 States Code, Section 2256(8), that had been mailed, shipped and transported in interstate
8 commerce and foreign commerce by any means including by computer; and material
9 containing child pornography, as defined in Title 18, United States Code, Section 2256(8),
10 that had been mailed, shipped and transported in interstate and foreign commerce, by any
11 means including by computer, in violation of Title 18, United States Code, Section
12 2252A(a)(2).

COUNT THREE

Possession of Child Pornography

GREGORY HOFFMAN,

18 defendant herein, did knowingly possess any book, magazine, periodical, film, videotape,
19 computer disk and any other material that contained an image of child pornography, as
20 defined in Title 18, United States Code, Section 2256(8), that had been mailed, shipped and
21 transported in interstate and foreign commerce by any means including by computer, and
22 that were produced using materials that had been mailed and shipped and transported in
23 interstate and foreign commerce, by any means including by computer, in violation of Title
24 18, United States Code, Section 2252A(a)(5)(B).

25 . . .

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1 **FORFEITURE ALLEGATION**

2 As a result of committing the offenses in violation of Title 18, United States
3 Code, Sections 2252A(a)(1), 2252A(a)(2) and 2252A(a)(5)(B), set forth above,

4 **GREGORY HOFFMAN,**

5 defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code,
6 Sections 2253(a)(1) and 2253 (a)(3), all visual depictions described in Title 18, United States
7 Code, Sections 2251, 2251A, 2252, and 2252A and all items containing such visual
8 depictions, which were transported, shipped and received in violation of Title 18, United
9 States Code, Section 2252A and all property, real and personal, used and intended to be
10 used to commit and promote the commission of the aforestated offense, including but not
11 limited to, the following properties: computer images, including movie files, depicting a minor
12 engaging in sexually explicit conduct and the diskettes and hard drives on which they are
13 maintained.

14 DATED: this 30th day of January 2008.

15 **A TRUE BILL:**

16
17 /s/
18 FOREPERSON OF THE GRAND JURY

19 GREGORY A. BROWER
20 United States Attorney

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22 NANCY J. KOPRE
23 Assistant United States Attorney

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